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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ALEXANDRA VILLA, individually and
dba IN HOUSE PUBLIC RELATIONS,

Plaintiff,

vs.

LISA ANDRADE, an individual, and
INHOUSE PUBLIC RELATIONS, LLC, a
limited liability company, and DOES 1
through 10, inclusive,

Defendants.

Case No. **CV14-2101 BRO (PJW)**

**COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF FOR
VIOLATION OF THE LANHAM ACT
AND UNFAIR COMPETITION**

Plaintiff Alexandra Villa dba In House Public Relations ("Villa" or
"Plaintiff") hereby complains against Defendants Lisa Andrade, InHOUSE Public
Relations LLC, and Does 1 through 10 (collectively referred to herein as
"Defendants") as follows:

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I. THE PARTIES

1. Plaintiff is, and at all times relevant herein was, residing and doing business in Los Angeles County, California. For over a decade, Plaintiff has been in the business of providing public relations services under the trade name "In House Public Relations."

2. Villa is informed and believes and thereon alleges, that Andrade is an individual residing in Texas, and who is conducting business in the County of Los Angeles, California at all times relevant hereto.

3. Villa is informed and believes and thereon alleges Defendant InHouse is a duly formed limited liability company that is and was conducting business in the County of Los Angeles, California.

4. Plaintiff is ignorant of the true names and capacities of the Defendants sued herein as Does 1 through 10, inclusive, and therefore sues said Defendants by such fictitious names. Plaintiff will amend this Complaint to allege the true names and capacities when the same has been ascertained. Villa is informed and believes, and thereon alleges, that each fictitiously-named Defendant is responsible in some manner for the occurrences herein alleged and that Plaintiff's damages as herein alleged were proximately caused by their conduct.

5. Each of the Defendants acted as an agent for each of the other Defendants in doing the acts alleged and each Defendant ratified and otherwise adopted the acts and statements performed, made or carried out by the other Defendants so as to make them directly and vicariously liable to Villa for the conduct complained of herein.

II. GENERAL ALLEGATIONS

6. Villa is a long-established and successful public relations firm, doing business under the trade and business name "In House Public Relations."

1 7. At some time after Villa began her business and established trade name
2 “In House” as a source identifier known in the relevant marketplace, Defendants
3 began running a competing public relations business under the same name.

4 8. Villa has requested that Defendants cease doing business under the
5 name “InHouse,” and Defendants have ignored such requests.

6 9. Thus, Villa brings this action for unfair competition under the
7 Trademark Act of 1946, as amended (The Lanham Act, 15 U.S.C. § 1051 et seq.),
8 unfair trade practices under California Business and Professions Code Sections
9 17200 et seq., negligence, and unfair competition under the common law of the
10 State of California.

11 10. Defendants’ use of the common trade name and related activities is
12 likely to confuse and deceive the public and has caused damage to Villa and the
13 goodwill of her business, all in amounts which are not yet ascertainable but which
14 are not less than the jurisdictional minimum of this court. It will divert sales and
15 make consumers and sellers think less of Villa’s services and business. In addition,
16 Defendants’ conduct has and will if not enjoined continue to, greatly diminish the
17 value of Villa’s business by confusing consumers, retailers and the press about the
18 both parties businesses and their respective origins.

19 11. Defendants’ aforesaid acts have caused, and will continue to cause,
20 damage and irreparable harm to Villa and are likely to continue unabated, thereby
21 causing further damage and irreparable harm to Villa, and to the goodwill associated
22 with Villa’s valuable and well-known marks and names and Villa’s business
23 relationships, unless preliminarily and permanently enjoined and restrained by the
24 Court.

25 12. Villa has no adequate remedy at law and will suffer irreparable injury if
26 Defendants are allowed to continue to wrongfully continue the conduct herein
27 described.

28 13. Villa is entitled to punitive, exemplary, statutory and special damages

1 as alleged above.

2
3 **First Claim For Relief for Unfair Competition Under Section 43(a) of**
4 **The Lanham Act (15 U.S.C. § 1125(a))**
5 **(Against All Defendants)**

6 14. Villa incorporates herein by this reference paragraphs 1 through 13 as if
7 set forth in full in this cause of action.

8 15. By Defendants' unlicensed, unconsented to, and otherwise
9 unauthorized use of Villa's names and marks, Defendants have wrongfully
10 appropriated for themselves business and goodwill value that properly belongs to
11 Villa and that Villa has invested time, money and energy developing.

12 16. Defendants' unlicensed, unconsented to, and otherwise unauthorized
13 use of Villa's names and marks and other signature source-identifying elements
14 constitutes a false representation that wrongly suggests to the trade, relevant
15 purchasing public, and consumers, that Villa is the source of, or endorses or
16 approves of, Defendants' services, or that Villa and Defendants are in some way
17 associated.

18 17. Defendants have intentionally traded, infringed upon, and diluted
19 Villa's marks, names and other signature thematic and source-identifying elements,
20 and misrepresented and created confusion regarding the source, origin, and quality
21 of Defendants' services.

22 18. By reason of Defendants' acts of unfair competition as alleged herein,
23 Plaintiff has suffered and will continue to suffer substantial damage to its business
24 in the form of diversion of trade, loss of profits, and a dilution in the value of its
25 rights, all in amounts which are not yet ascertainable but which are estimated to be
26 not less than the jurisdictional minimum of this court.

27
28

19. By virtue of Defendants' acts hereinabove described, Defendants have committed, and are continuing to commit, unlawful, unfair, and fraudulent business acts in violation of, *inter alia*, 15 U.S.C. § 1125(a).

**Second Claim For Relief for Unfair Competition Under
Business and Professions Code §§ 17200 et seq.
(Against All Defendants)**

20. Villa incorporates herein by this reference paragraphs 1 through 19 as if set forth in full in this cause of action.

21. Defendants, by means of the conduct above, have engaged in, and are engaging in, unlawful, unfair, and deceptive business practices under California Business and Professions Code §§ 17200 through 17203. These acts and practices undertaken by Defendants violate California Business & Professions Code § 17200 in that they are—as described above—unfair, fraudulent, and/or unlawful. Specifically, without limiting the generality of the foregoing, such acts and practices are and were fraudulent in that: (a) Defendants seek to deceive consumers regarding the source, quality and origin of their goods and their association with Villa, and (b) the general public and trade is likely to be confused regarding the business relationship between Villa and Defendants. Further, without limiting the generality of the foregoing, the harm to Villa and to members of the general public far outweighs the utility of Defendants' practices and, consequently, Defendants' practices constitute an unfair business act or practice within the meaning of Business and Professions Code § 17200. Further, without limiting the generality of the foregoing, such acts by Defendants are unlawful in that they violate, *inter alia*, provisions of the Lanham act as alleged above.

22. Villa has sustained, and will continue to sustain, serious and irreparable injury to its business and reputation, as a direct and proximate result of Defendants' conduct (as described above). Unless Defendants are enjoined by this Court, there

1 is a substantial possibility that they will continue to engage in such unlawful, unfair,
 2 and deceptive business practices, for which Villa is without an adequate remedy at
 3 law. Accordingly, Villa is entitled to a preliminary injunction and permanent
 4 injunction against Defendants and their officers, directors, employees, agents,
 5 representatives, affiliates, subsidiaries, distributors, and all persons acting in concert
 6 with them, prohibiting them from engaging in further unlawful, unfair and/or
 7 fraudulent business practices.

8 23. As a direct result of Defendants' unlawful, unfair, fraudulent, and
 9 deceptive business practices, Defendants have received, and continue to receive,
 10 income and profits that they would not have earned but for their unlawful, unfair,
 11 and deceptive conduct, and Villa is entitled to disgorgement of such funds
 12 wrongfully obtained.

13 24. By reason of Defendants' acts of unfair competition as alleged herein,
 14 Plaintiff has suffered and will continue to suffer substantial damage to its business
 15 in the form of diversion of trade, loss of profits, loss of goodwill, and a dilution in
 16 the value of its rights.

17 25. Villa is also entitled under the provisions of Business and Professions
 18 Code § 17208 to an injunction prohibiting Defendants, and each of them, from
 19 engaging in any act, directly or indirectly, which constitute unlawful, unfair, and
 20 deceptive business practices.

21 26. Villa is entitled to punitive damages as alleged above.

22 27. Defendants' conduct, if allowed to proceed and continue and/or let
 23 stand, will cause irreparable damage to Villa' valuable business relationships and
 24 consumer relations and will require Villa to undertake efforts to mitigate damage to
 25 such relations, all to Villa' detriment. Further, such mitigation costs will require
 26 substantial time, effort, and expenditures by Villa, all to Villa' detriment.

**Third Claim For Relief for Unfair Competition Under
California Common Law
(Against All Defendants)**

28. Villa incorporates herein by this reference paragraphs 1 through 27 as if set forth in full in this cause of action.

29. The actions of Defendants, as alleged above, constitute unfair competition under California common law.

30. Defendants' alleged conduct was, and continues to be, intentional, deliberate, willful, malicious, and in blatant disregard of Villa's rights; and was, and continues to be, undertaken with oppression, fraud and malice.

31. As a direct result of Defendants' unfair competition, Defendants have received and continue to receive income and profits that they would not have otherwise earned, and Villa is entitled to disgorgement of such funds wrongfully obtained.

32. By reason of Defendants' acts of unfair competition as alleged herein, Plaintiff has suffered and will continue to suffer substantial damage to its business in the form of diversion of trade, loss of profits, and a dilution in the value of its rights, all in amounts which are not yet ascertainable but which are estimated to be not less than the jurisdictional minimum of this court.

33. Villa has sustained, and will continue to sustain, serious and irreparable injury to their business and reputation, a direct and proximate result of Defendants' acts of unfair competition (as described above). Unless Defendants are enjoined by this Court, there is a substantial possibility that they will continue to engage in such misconduct, for which Villa is without an adequate remedy at law. Accordingly, Villa is entitled to a preliminary injunction and permanent injunction against Defendants and their officers, directors, employees, agents, representatives, affiliates, subsidiaries, distributors, and all persons acting in concert with them, prohibiting them from engaging in further unfair competition.

34. Villa is further informed and believes and thereon alleges that Defendants have unlawfully and unjustly profited from the acts herein alleged. Accordingly, Villa is entitled to an award against Defendants for the recovery of any gains, profits and advantages Defendants have obtained as a result of their unlawful conduct, Villa's damages, attorneys' fees and costs, as well as exemplary and punitive damages (pursuant to California Civil Code § 3294).

35. Villa is entitled to punitive damages as alleged above.

36. Villa is further informed and believes and thereon alleges that Defendants have unlawfully and unjustly profited from the acts herein alleged. Accordingly, Villa is entitled to an award against Defendants for the recovery and of any gains, profits and advantages Defendants have obtained as a result of his unlawful conduct, Villa's damages, attorneys' fees and costs, as well as exemplary and punitive damages (pursuant to California Civil Code § 3294).

**Fourth Claim For Relief for Federal False Designation Of Origin And
Misleading Representation (15 U.S.C. ' 1125(a))
(Against All Defendants)**

37. Villa incorporates herein by this reference paragraphs 1 through 86 as if set forth in full in this cause of action.

38. Defendants' use of the "InHOUSE Public Relations" name and other signature elements, constitutes a false designation of origin, or false or misleading representation of fact which is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection or association of Defendants with Villa, or as to the origin, sponsorship or approval of Defendants' commercial activities, and as a consequence, are likely to divert and have diverted customers away from Villa.

39. Villa has no control over the nature and quality of Defendants' goods. Any failure, neglect or default by Defendants in providing such goods will reflect adversely on Villa as the believed source of origin thereof, hampering efforts by

1 Villa to continue to protect its outstanding reputation for high quality goods,
 2 resulting in loss of sales thereof and the considerable expenditure to promote its
 3 products and services, all to the irreparable harm of Villa.

4 40. Defendants' use of the "InHOUSE Public Relations" name has caused
 5 and is likely to cause confusion and false designation of origin in the trade and
 6 among the public. This confusion constitutes irreparable harm to Villa, which will
 7 continue unless Defendants are enjoined by this Court.

8
 9 **Fifth Cause Of Action for Negligence**
 10 **(Against All Defendants)**

11 41. Villa incorporates herein by this reference paragraphs 1 through 85 as if
 12 set forth in full in this cause of action.

13 42. Defendants, and each of them, owed a duty of care to Villa, as
 14 described above.

15 43. Defendants breached their duty of care to Villa and failed to exercise
 16 reasonable care in that, among other things, they failed to prevent injurious implied
 17 falsehoods from reaching the public.

18 44. As a proximate result of Defendants' negligence, Villa has been
 19 damaged in an amount to be proven at trial but exceeding the jurisdictional
 20 minimum of this Court.

21
 22 **III. PRAYER**

23 WHEREFORE, Villa pray judgment against Defendants as follows:

24 1. That Villa be awarded all damages, including future damages, that
 25 Villa has sustained, or will sustain, as a consequence of the acts complained of
 26 herein, subject to proof at trial;

27 2. That Villa be awarded its costs, attorneys' fees and expenses in this
 28 action;

1 3. That Villa be awarded pre-judgment interest;

2 4. For an order permanently enjoining Defendants and their employees,
3 agents, servants, attorneys, representatives, successors, and assigns, and any and all
4 persons in active concert or participation with any of them, from engaging in the
5 misconduct referenced herein;

6 5. That Defendants be adjudged to have engaged in unlawful, unfair
7 and/or fraudulent business practices and unfair competition in violation of California
8 Business and Profession Code §§ 17200 et seq.;

9 6. For disgorgement of all proceeds, and restitution of the moneys
10 wrongfully received by Defendants as the result of their unlawful, unfair, and
11 deceptive business practices;

12 7. For punitive damages in an amount sufficient to deter Defendants, and
13 each of them, from their wrongful conduct;

14 8. For statutory damages; and

15 9. That Villa have such other and further relief as the Court may deem
16 appropriate.

17
18
19 DATED: March 18, 2014

David A. Erikson

20
21 By: 

22 David A. Erikson

23 Attorney for Plaintiff Alexandra Villa
24
25
26
27
28

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial on its claims on all issues triable by a jury.

DATED: March 18, 2014

David A. Erikson

By:


David A. Erikson

Attorney for Plaintiff Alexandra Villa

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge Beverly Reid O'Connell and the assigned Magistrate Judge is Patrick J. Walsh.

The case number on all documents filed with the Court should read as follows:

CV14-2101-BRO(PJWx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge.

Clerk, U. S. District Court

March 19, 2014

Date

By C. Sawyer
Deputy Clerk

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ Western Division
312 N. Spring Street, G-8
Los Angeles, CA 90012

☐ Southern Division
411 West Fourth St., Ste 1053
Santa Ana, CA 92701

☐ Eastern Division
3470 Twelfth Street, Room 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I. (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) Alexandra Villa, individually and dba In House Public Relations	DEFENDANTS (Check box if you are representing yourself <input type="checkbox"/>) Lisa Andrade, an individual, and InHouse Public Relations, LLC, a limited liability company, and DOES 1 through 10, inclusive
(b) County of Residence of First Listed Plaintiff <u>Los Angeles</u> (EXCEPT IN U.S. PLAINTIFF CASES)	County of Residence of First Listed Defendant <u>Bexar</u> (IN U.S. PLAINTIFF CASES ONLY)
(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information. Erikson Law Group, 200 N. Larchmont Blvd., Los Angeles, CA 90026	Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

II. BASIS OF JURISDICTION (Place an X in one box only.) <div style="display: flex; justify-content: space-between;"> <div style="width:48%;"> <input type="checkbox"/> 1. U.S. Government Plaintiff <input type="checkbox"/> 2. U.S. Government Defendant </div> <div style="width:48%;"> <input checked="" type="checkbox"/> 3. Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III) </div> </div>	III. CITIZENSHIP OF PRINCIPAL PARTIES -For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant) <table style="width:100%; font-size: small;"> <tr> <th></th> <th>PTF</th> <th>DEF</th> <th></th> <th>PTF</th> <th>DEF</th> </tr> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)

<input checked="" type="checkbox"/> 1. Original Proceeding	<input type="checkbox"/> 2. Removed from State Court	<input type="checkbox"/> 3. Remanded from Appellate Court	<input type="checkbox"/> 4. Reinstated or Reopened	<input type="checkbox"/> 5. Transferred from Another District (Specify)	<input type="checkbox"/> 6. Multi-District Litigation
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V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)

CLASS ACTION under F.R.Cv.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ TBD at trial; injunction

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 15 U.S.C. §1125(a)

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions		<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	TORTS		<input checked="" type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument	TORTS	PERSONAL INJURY	<input type="checkbox"/> 530 General	SOCIAL SECURITY
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	Other:	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 340 Marine	BANKRUPTCY	<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	FORFEITURE/PENALTY	FEDERAL TAX SUITS
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 893 Environmental Matters	REAL PROPERTY	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 440 Other Civil Rights	LABOR	
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 740 Railway Labor Act	
<input type="checkbox"/> 950 Constitutionality of State Statutes		<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 751 Family and Medical Leave Act	
		<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 790 Other Labor Litigation	
				<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	STATE CASE WAS PENDING IN THE COUNTY OF:		INITIAL DIVISION IN CACD IS:
	<input type="checkbox"/> Los Angeles		Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo		Western
	<input type="checkbox"/> Orange		Southern
	<input type="checkbox"/> Riverside or San Bernardino		Eastern

Question B: Is the United States, or one of its agencies or employees, a party to this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	If the United States, or one of its agencies or employees, is a party, is it:		INITIAL DIVISION IN CACD IS:
	A PLAINTIFF? <small>Then check the box below for the county in which the majority of DEFENDANTS reside.</small>	A DEFENDANT? <small>Then check the box below for the county in which the majority of PLAINTIFFS reside.</small>	
	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	Eastern
	<input type="checkbox"/> Other	<input type="checkbox"/> Other	Western

Question C: Location of plaintiffs, defendants, and claims? (Make only one selection per row)	A. Los Angeles County	B. Ventura, Santa Barbara, or San Luis Obispo Counties	C. Orange County	D. Riverside or San Bernardino Counties	E. Outside the Central District of California	F. Other
Indicate the location in which a majority of plaintiffs reside:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

C.1. Is either of the following true? If so, check the one that applies: <input type="checkbox"/> 2 or more answers in Column C <input type="checkbox"/> only 1 answer in Column C and no answers in Column D Your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question D, below. If none applies, answer question C2 to the right. →	C.2. Is either of the following true? If so, check the one that applies: <input type="checkbox"/> 2 or more answers in Column D <input type="checkbox"/> only 1 answer in Column D and no answers in Column C Your case will initially be assigned to the EASTERN DIVISION. Enter "Eastern" in response to Question D, below. If none applies, go to the box below. ↓
Your case will initially be assigned to the WESTERN DIVISION. Enter "Western" in response to Question D below.	

Question D: Initial Division? Enter the initial division determined by Question A, B, or C above: →	INITIAL DIVISION IN CACD Western
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UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

IX(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ NO ☐ YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ NO ☐ YES

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

(Check all boxes that apply)

- ☐ A. Arise from the same or closely related transactions, happenings, or events; or
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- ☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

X. SIGNATURE OF ATTORNEY

(OR SELF-REPRESENTED LITIGANT):

DATE: 3/18/14

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))